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March 30, 2016

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin Cook
Chief Executive Officer
University of Mississippi Medical Center
2500 N. State Street, Room U016
Jackson, MS 39216

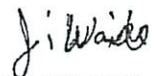
Mr. Alan W. Perry, President
Board of Trustees
Mississippi Institutions of Higher Learning
3825 Ridgewood Road
Jackson, MS 39211

RE: Notice of Claim of Elizabeth Henry

Dear Mr. Cook and Mr. Perry:

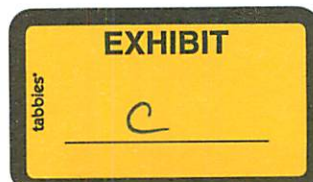
Please find enclosed herein a Notice of Claim of Elizabeth Henry. I would appreciate prompt action on this claim.

Sincerely yours,


JIM WAIDE

JDW/pbn
Enclosure

cc: Elizabeth Henry
Mr. Jerry Estes



**BEFORE THE BOARD OF TRUSTEES - MISSISSIPPI STATE
INSTITUTIONS OF HIGHER LEARNING AND
UNIVERSITY OF MISSISSIPPI MEDICAL CENTER**

NOTICE OF CLAIM OF ELIZABETH HENRY

Pursuant to Miss. Code Ann. § 11-46-1, et seq., notice is hereby given of a claim for damages by Elizabeth Henry (hereinafter "Claimant") against the University of Mississippi Medical Center (hereinafter "UMMC"), the Board of Trustees - Mississippi State Institutions of Higher Learning, Sharron Poole (hereinafter "Poole"), and Barbara Smith (hereinafter "Smith").

NATURE OF CLAIM

This nature of claim is for negligent deliberate infliction of mental distress, malicious interference with employment and constructive discharge. The claims against the individuals involve malice and are outside the Mississippi Torts Claim Act. They are listed out of an abundance of caution.

**STATEMENT OF THE FACTS AND
CIRCUMSTANCES WHICH CAUSED THE INJURY**

Claimant has been employed by UMMC as a registered nurse for twenty-one (21) years until her constructive discharge on February 12, 2016.

Poole, Director of the Business Office of the Department of Neurosurgery, has always been extremely jealous of all nurses, especially Claimant. Claimant's chairman, Dr. Louis Harkey, has repeatedly told her that Poole's dislike and jealousy of Claimant was because of Claimant's high salary and the high regard surgeons have for her. In approximately May 2015, Poole carried Claimant to the compliance office, with no prior warning, where false charges were made against her about her improperly accessing patients' records between 2008 and 2015. The Compliance

Department personnel accused Claimant of improperly accessing four patients' records - three of whom are Claimant's family members. Each time Claimant accessed the records was for patient care. In each case, Claimant had been directed by a physician and/or the patient to do so.

Poole was only able to learn about Claimant accessing the records by having Terri Walker, an IT technician, give Poole access to Claimant's computer in-basket, and told Walker not to tell Claimant and the other nurses what she was doing. Dr. Harkey took corrective action against Poole, which caused Poole to have even more animosity and ill-will toward Claimant and the other nurses.

Claimant never heard anything back or received any discipline from the false charges made against her in May, 2015, even though she has asked several times.

On February 12, 2016, Poole, again, asked Claimant to accompany her. Poole refused to tell Claimant where they were going, despite Claimant repeatedly asking her. They went to the HR department where Claimant was confronted by the manager, Barbara Smith, and three other employees, about accessing the files of patients' records that she had been asked about in May 2015. Smith accused Claimant of accessing her own daughter's and her own sister's records. When Claimant denied accessing her daughter's record, Smith ordered Claimant to not raise her voice. Claimant told Smith she was not raising her voice, but she was trying to defend herself. Claimant asked for the birth date of the records said to be her daughter's records just to confirm that this was her daughter. Smith informed Claimant that she did not have to tell her anything and that she (Smith) asked the questions in that office. Smith also told Claimant that she had no rights in that office. Claimant told Smith that since she could not defend herself against the false accusations, she would have to come back with an attorney. Smith replied, "If you are going to hire an attorney, "I will just terminate you now."

Poole then spoke up and advised Claimant it would be better if she resigned rather than being terminated. A pre-printed letter of resignation was given to Claimant, stating her termination was immediate. Poole made Claimant write "compliance violation" on the letter and sign it. Claimant's resignation was not voluntary, but was a forced resignation or a constructive discharge.

EXTENT OF THE INJURY

Claimant has suffered anxiety and stress, lost income, loss of retirement benefits, and loss of health and life insurance benefits, as a result of her treatment from Poole and Smith. Claimant is currently seeing a physician for anxiety and stress, and has incurred medical bills.

TIME AND PLACE INJURY OCCURRED

The injury occurred at the University of Mississippi Medical Center Human Resources Department, 2500 N. State Street, Jackson, Mississippi 39216 on February 12, 2016.

PERSONS KNOWN TO BE INVOLVED

Persons having knowledge of the injuries include:

1. Sharron Poole, University of Mississippi Medical Center, 2500 N. State Street, Jackson, Mississippi 39216, 601-984-5700;
2. Barbara Smith, Manager, Human Resources, University of Mississippi Medical Center, 2500 N. State Street, Jackson, Mississippi 39216, 601-984-5700;
3. Dr. Louis Harkey, University of Mississippi Medical Center, 2500 N. State Street, Jackson, Mississippi 39216, 601-984-5700;
4. Terri Walker, IT Technician, University of Mississippi Medical Center, 2500 N. State Street, Jackson, Mississippi 39216, 601-984-5700;
5. Pamela Clark, Nurse, University of Mississippi Medical Center, 2500 N. State Street, Jackson, Mississippi 39216, 601-984-5700;
6. Ruby C. Henry, (Claimant's mother-in-law) 7859 Highway 481 N. Morton, MS 39202, 601-732-6458;

7. Barbara Castleberry, (Claimant's mother) 3604 Crane Blvd., Jackson, MS 39216, 601-362-4222;
8. Mary Ewing, (Claimant's sister) 610 Rio Street, Jackson, MS 39202, 601-352-4329;
9. Charlie Henry, Jr. (Claimant's husband), 7225 Highway 481 N., Morton, MS 39117, 601-732-6236;
10. Christina Waggoner (Claimant's daughter), 2141 Russell Community Road, Forest, MS 39074, 601-900-9072.

**RESIDENCE OF CLAIMANT AT THE TIME OF THE INJURY
AND AT THE TIME OF FILING THE NOTICE**

Currently, and at the time of the injury, Claimant resides at 7225 Highway 481 N., Morton, MS 39117.

TOTAL AMOUNT OF DAMAGES SOUGHT

Claimant seeks damages in the amount of \$500,000.00.

This the 30 day of Jan, 2016.

Respectfully submitted,

WAIDE & ASSOCIATES, P.A.

BY: _____

JIM WAIDE

MS BAR NO. 6857

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